



# Vulnerable Clients Handling Policy

Corporate Governance & Compliance Policies

**Customer Support Department**  
Swiftfox, 9 South Molton Street,  
Mayfair, London, W1K 5QH,  
United Kingdom

**E:** [support@swiftfox.co.uk](mailto:support@swiftfox.co.uk)  
**T:** +44 (0)203 751 7522  
**W:** [swiftfox.co.uk](http://swiftfox.co.uk)



# 1. Policy Statement

Swiftfox is committed to providing inclusive, considerate, and respectful services to all clients, including those who are vulnerable. We recognize the importance of identifying and providing additional support to vulnerable clients to ensure they are treated fairly and their financial well-being is safeguarded.

## 2. Definition of Vulnerability

A client is considered vulnerable if they have characteristics or circumstances that significantly reduce their ability to make informed decisions or represent a heightened risk of harm from financial services. This can include, but is not limited to, age-related impairments, mental health issues, physical disabilities, financial hardship, or language barriers.

## 3. Identifying Vulnerable Clients

- Employees will be trained to recognize signs of vulnerability in clients.
- Swiftfox will maintain processes to allow clients to self-identify as vulnerable.

## 4. Training and Awareness

- All staff will receive training on how to identify and interact appropriately with vulnerable clients.
- Training will include understanding the different types of vulnerabilities and how they may impact the client's ability to make financial decisions.

## 5. Client Communication

- Communication methods will be adapted to meet the needs of vulnerable clients.
- Information will be provided in clear, understandable language, avoiding technical jargon.
- Clients will be given additional time and support to make informed decisions.

## 6. Data Protection and Privacy

- Personal information about a client's vulnerability will be handled with the utmost confidentiality and in line with data protection regulations.



## 7. Review of Decisions

- Decisions affecting vulnerable clients will be subject to a higher level of scrutiny and review.

## 8. Feedback and Complaints

- Swiftfox will provide easily accessible means for vulnerable clients to provide feedback or lodge complaints.
- Complaints from vulnerable clients will be prioritised and handled sensitively.

## 9. Continuous Improvement

- Swiftfox will regularly review and update this policy and its procedures to ensure the ongoing protection and fair treatment of vulnerable clients.

## 10. Contact Information

- Clients or their representatives can contact Swiftfox for support related to vulnerability through dedicated channels.